

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

EMPIRE HOLDINGS GROUP LLC, also d/b/a
ECOMMERCE EMPIRE BUILDERS and
STOREFUNNELS.NET, a limited liability
company, and

PETER PRUSINOWSKI, aka PETER PRU,
individually and as an officer of Empire Holdings
Group LLC,

Defendants.

Case No. 24-CV-4949

**PLAINTIFF'S RECOMMENDATION
FOR TEMPORARY RECEIVER**

In connection with its Motion for a Temporary Restraining Order, Plaintiff Federal Trade Commission ("FTC") makes the following recommendation regarding the appointment of a temporary receiver over Empire Holdings Group LLC, also dba Ecommerce Empire Builders and Storefunnels.net.

TEMPORARY RECEIVER RECOMMENDATION

1. The Plaintiff proposes that the Court appoint Kevin Dooley Kent as a temporary receiver over Defendants in this matter. Mr. Dooley Kent has significant experience acting as a federal equity receiver or representing receivers in government enforcement actions. Mr. Dooley Kent was among the original members, and currently serves on the Board of Directors of the National Association of Federal Equity Receivers (NAFER). He also chairs NAFER's Publications Committee and serves on its International Committee.

2. Mr. Dooley Kent is qualified to serve as a temporary receiver and has expressed a willingness to do so. A copy of his qualifications and fee schedule is attached as **Attachment A**. As reflected in Attachment A, Mr. Dooley Kent has extensive experience with complex receivership matters.

3. The receiver's responsibilities likely will involve substantial asset tracing to recover funds derived from Defendants' illegal conduct. Mr. Dooley Kent's resources and experience make him qualified to manage such a task.

4. We are unaware of any conflicts of interest that would prevent Mr. Dooley Kent from acting as a receiver in this matter.

5. Should the Court desire to consider other options for a temporary receiver, the FTC can provide names of additional highly qualified candidates.

Respectfully submitted,

Dated: September 18, 2024

/s/ Amanda Grier

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